IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FREDERICK J. GREDE, as Liquidation Trustee of the Sentinel Liquidation Trust, Plaintiff,) Case No. 08-CV-06587) Honorable James B. Zagel)
v.)
STEPHEN M. FOLAN, JACQUES DE SAINT PHALLE, FTN FINANCIAL SECURITIES CORP., and FIRST TENNESSEE BANK, N.A.,))))))
Defendants.)
FREDERICK J. GREDE, as Liquidation Trustee of the Sentinel Liquidation Trust, Assignee of certain claims,) Case No. 09-CV-02258) Honorable James B. Zagel)
Plaintiff,)
v.))
FTN FINANCIAL SECURITIES CORP. and JACQUES DE SAINT PHALLE)))
Defendants.	,))

NOTICE OF MOTION

PLEASE TAKE NOTICE that on April 18, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable James B. Zagel, or any Judge sitting in his stead, in the courtroom, normally occupied by him in the United States District Court for the Northern District of Illinois, Eastern Division, 219 Dearborn Street, Room 2503, Chicago, Illinois, and shall then present the concurrently filed MOTION FOR LEAVE TO DEPOSE PHILIP J. BAKER, which is hereby served upon you.

Dated: April 14, 2011 Respectfully submitted,

/s/ Michael B. Slade

Brian D. Sieve, P.C. (ARDC #6199741) Michael B. Slade (ARDC #6274231)

KIRKLAND & ELLIS LLP

300 N. LaSalle Street

Chicago, Illinois 60654-6636 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Howard M. Shapiro
Patrick J. Carome
John A. Valentine
WILMER CUTLER PICKERING HALE
AND DORR LLP

1875 Pennsylvania Avenue, N.W.

Washington, DC 20006 Telephone: (202) 663-6000 Facsimile: (202) 663-6363

Mark D. Griffin Lori H. Patterson Kristine L. Robert BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC

First Tennessee Building 165 Madison Avenue, Suite 2000 Memphis, Tennessee 38103 Telephone: (901) 526-2000 Facsimile: (901) 577-0870

Attorneys for Defendants Stephen M. Folan, Jacques de St. Phalle, and FTN Financial Securities Corp., and First Tennessee Bank, N.A.

William Gibbs Sullivan
Royal B. Martin
Mason N. Floyd
MARTIN, BROWN, SULLIVAN, ROADMAN
& HARTNETT, LTD
135 S. LaSalle St., Ste. 3200
Chicago, IL 60603
Phone: (312) 360-5000

Attorneys for Stephen M. Folan and Jacques de St. Phalle

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Notice of Motion** was filed electronically with the Clerk of the Court using the CM/ECF system on April 14, 2011, which will send notification of such filings to the parties registered with the Court's CM/ECF system, including the recipients shown below,

Chris C. Gair, Esq.
James Kevin McCall, Esq.
Jeffrey S. Eberhard, Esq.
Gregory M. Boyle, Esq.
Anne Paffrath Ray, Esq.
Kevin Case, Esq.
Vincent E. Lazar, Esq.
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Attorneys for the Liquidation Trustee

and by e-mail and first class mail to the following:

Kurt Edward Stitcher Mindy Anne Finnigan Baker & Daniels LLP 311 S. Wacker Drive, Suite 4400 Chicago, IL 60606

Amy Alison Pines Levenfeld Pearlstein, LLC 2 North LaSalle Street, Suite 1300 Chicago, IL 60602

Attorneys for Philip J. Baker in United States v. Philip J. Baker Case No. 09-cr-00175 (N.D. Ill.)

/s/ Michael B. Slade
Brian D. Sieve, P.C. (ARDC #6199741)
Michael B. Slade (ARDC #6274231)
KIRKLAND & ELLIS LLP
300 N. LaSalle Street
Chicago, Illinois 60654-6636
Telephone: (312) 862-2000
Facsimile: (312) 862-2200